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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA

12 MOHAMMAD SUBHANI,

Case No.: 3:12-cv-01755-MEJ

13 Plaintiff,

**STIPULATION TO CONTINUE
DEFENDANT'S DEADLINE TO
RESPOND TO PLAINTIFF'S
COMPLAINT**

14 vs.

15 WELLS FARGO BANK, NATIONAL
ASSOCIATION an FDIC insured corporation
16 and does 1 through 100, inclusive,

Complaint Date: March 8, 2012

17 Defendant.

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19 WHEREAS, on March 8, 2012, plaintiff Mohammad Subhani ("Plaintiff") filed an initial
20 complaint ("Complaint") in the Superior Court of the State of California, for the County of Contra
21 Costa, Case No. C 12-00551 ("Action");

22 WHEREAS, on March 8, 2012, Plaintiff served the Complaint upon defendant Wells Fargo
23 Bank, N.A. ("Wells Fargo");

24 WHEREAS, on April 9, 2012, Wells Fargo removed the Action to this Court;

25 WHEREAS, under the Federal Rules of Civil Procedure, Wells Fargo's current deadline to
26 answer or otherwise respond to the Complaint is April 16, 2012;

27 WHEREAS, the parties have engaged in settlement discussions, which are ongoing;

WHEREAS, to facilitate the parties' settlement discussions, Plaintiff has agreed to extend the deadline for Wells Fargo to answer or otherwise respond to the Complaint by 14 days; and

WHEREAS, the agreed-upon extension will not alter the date of any event or any deadline already fixed by Court order;

NOW THEREFORE, IT IS HEREBY STIPULATED by the parties hereto, through their respective counsel, that:

1. The time for Wells Fargo to answer or otherwise respond to the Complaint shall be extended until and including April 30, 2012; and

2. This stipulation is without prejudice to the rights, claims, arguments and defenses of all parties.

DATED: April 11, 2012

SAGARIA LAW, P.C.

By: /s/ Elliott W. Gale
Elliot W. Gale

Attorneys for Plaintiff
Mohammad Subhani

DATED: April 11, 2012

SEVERSON & WERSON
A Professional Corporation

By: _____ /s/ *Alisa A. Givental*
Alisa A. Givental

Attorneys for Defendant
Wells Fargo Bank, N.A.

Filer's Attestation: Pursuant to General Order No. 45, Section X(B) regarding signatures, I attest under penalty of perjury that concurrence in the filing of the document has been obtained from Elliott W. Gale.

/s/ Alisa A. Givental
Alisa A. Givental

1 **PROPOSED ORDER**

2 Pursuant to the stipulation of the parties and GOOD CAUSE APPEARING:

3 IT IS HEREBY ORDERED that the time for Wells Fargo to answer or otherwise respond
4 to the Complaint shall be extended until and including April 30, 2012.

5 DATED: April 16, 2012

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10 UNITED DISTRICT COURT OF THE
11 NORTHERN DISTRICT OF CALIFORNIA
12 CHIEF MAGISTRATE JUDGE MARIA-
13 ELENA JAMES